UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Chris Gregerson,

No. 06-CV-01164 (ADM/AJB)

Plaintiff.

VS.

Vilana Financial, Inc. a Minnesota Corporation; Vilana Realty, Inc. a Minnesota Corporation; and Andrew Vilenchik, a private individual, AFFIDAVIT OF
VLADIMIR KAZARYAN
IN SUPPORT OF
MOTION TO QUASH SUBPOENA

Defendants.

STATE OF MINNESOTA)

SS

COUNTY OF HENNEPIN)

VLADIMIR KAZARYAN, first being duly sworn upon oath states as follows:

- 1. My name is Vladimir Kazaryan. I make this Affidavit of my personal knowledge and would so testify if called upon to do so.
- 2. I make this Affidavit in support of my motion to quash a subpoena that was served on me by the Plaintiff to testify at a deposition.
- 3. Attached hereto as Exhibit 1 is a copy of the transcript of my deposition which was taken on February 6, 2006, in the case of *Vilana Financial, Inc. v. Chris Gregerson*, Hennepin County District Court Case no. MC 05-016185. The deposition was noticed by Chris Gregorson, the above-named Plaintiff.
- 4. Attached hereto as Exhibit 2 is a copy of a subpoena that was served on me on or about October 31, 2006, compelling me to testify at a deposition noticed by the Plaintiff.

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5. I believe that the Plaintiff intends to re-examine me on subjects to which I

already testified at the February 6, 2006 deposition.

6. I believe that Plaintiff intends to harass me until I give him testimony that

he considers favorable to his claims. Attached hereto as Exhibit 3 is a copy of a letter

that was faxed to me by Plaintiff threatening to name me as a party in this litigation

simply because my notorial seal and signature appears on a document that he considers to

be important to his case.

7. It will be a financial hardship for me to be deposed again, and the witness

fee and mileage check that I received will not begin to compensate me for the time away

from my work.

Date: November 27, 2006 s/ Vladimir Kazaryan

Vladimir Kazaryan

Subscribed and sworn to before me this 27th day of November 2006.

s/ Sukanya Guha

Notary Public

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